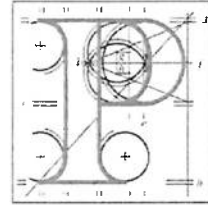


**Our Case Number:** ABP-317660-23



**An  
Bord  
Pleanála**

Sharon Sabin & Bruno Rodrigues de Oliveira  
1 Mount Argus Court  
Lr. Kimmage Road  
Harold's Cross  
Dublin 6W  
D6W KV84

**Date:** 08 December 2023

**Re:** Bus Connects Kimmage to City Centre core bus corridor scheme  
Kimmage, Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

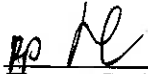
If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Yours faithfully,



Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02A

**Teil**  
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**AN BORD PLEANÁLA**  
LDG- 0685 29-23  
ABP- \_\_\_\_\_  
08 DEC 2023  
Fee: € 50 Type: CHD  
Time: 13:28 By: hand

Sharon Sabin &  
Bruno Rodrigues de Oliveira,  
1 Mount Argus Court,  
Lr. Kimmage Road,  
Harold's Cross, Dublin 6W  
Eircode D6W KV84

An Bord Pleanála  
Strategic Infrastructure Division  
64 Marlborough Street  
Dublin 1 D01V902

7th December 2023

**Re. KIMMAGE TO CITY CENTRE CORE BUS CORRIDOR SCHEME - OBJECTION AND OBSERVATION**

*With apologies for the poor print quality of this letter*  
*S Sabin*

Dear An Board Pleanála Members,

We would like to submit an observation outlining our strong objection to the proposed Kimmage to City Centre Bus Corridor Scheme due to the adverse impact it will have on our estate - a community of over four hundred residents.

Our estate (Mount Argus & Church Park) comprises families young and old, third-level students, working professionals, pensioners, homeowners, renters and more, and these residents are walkers, cyclists, bus passengers and motorists. We ourselves use a combination of all these forms of transport for work, and for familial leisure, social, and other activities and whilst we are regular cyclists, we feel strongly that, in particular, the part of the Bus Corridor Scheme that proposes the creation of a Cycle Path from Sundrive Road through our estate should not be supported by your Body as it would have a detrimental effect on the character of the estate while providing little, if any, benefit to cyclists and may in fact put them and all road users in the estate at an increased risk of having an accident.

Our main concerns are:

**1. An Increased Danger to Cyclists and Other Road Users, Including Residents of Mount Argus and Church Park, and Health and Safety Issues for Pedestrians**

The previous version of the Kimmage to City Centre Bus Connects, proposed a cycle route to be achieved by creating an opening from Sundrive Road to Mount Argus Way from where the cycle path would then go through the park in our Estate to Mount Argus Church car park, then down Mount Argus Road, reconnecting with the main spine corridor at Harold's Cross Park. This proposal had certain merits in that it would have created a relatively quiet cycle way of approximately 950 metres and provided a cyclist with a pleasant and meaningful

alternative to traversing the length of the Lower Kimmage Road from Sundrive Road to Harold's Cross Park.

However, due to being unable to get approval for access through the private grounds of Mount Argus Church, the revised option i.e. the current cycle path plan proposes a thoroughly pointless route, again creating an opening from Sundrive Road to Mount Argus Way but which then turns right from Mount Argus Way around on to Mount Argus View and out on to Lower Kimmage Road. The length of this route is 344 metres which is longer than if a cyclist remained on the cycle track at Sundrive Road and turned left on to Lower Kimmage Road using the current advisory cycle route; the latter being 266 metres.

If a cyclist were to use the proposed cycle route their journey time would be increased slightly and they would be no safer than had they not taken the route and instead turned left from Sundrive Road on to Lower Kimmage Road, as the proposed cycle route has them exiting the estate on to Lower Kimmage Road anyway! Clearly the benefits the revised route offers a cyclist are negligible. In fact, the current plan presents an increased danger to cyclists and other road users including the residents of our estate as, once in the estate, cyclists on route have to share Mount Argus Way and Mount Argus View with other road users. There are two severe bends at Mount Argus View and the visibility on both sides is very poor. The road is narrow and cars are often parked there. If two cars coming in opposite directions to one another meet there, one driver has to stop to let the other vehicle pass through first. There have already been many near misses involving vehicles at this location and now the proposed cycle route intends cyclists to share these roads. This idea is likely to lead to accidents.

Many families in our estate have young children who walk to school and who also play outside in the estate and in the park, as do children from both the Mount Argus Mill development and the Transitional Accommodation Hub. These children will be at risk from lines of cyclists navigating these two small roads (Mount Argus Way and Mount Argus View) at speed during rush hours. In addition, people walking to church will encounter a section of the cycle route bisecting their path where no controls such as lights are in place like those which already exist out on the main Lower Kimmage Road.

## **2. An Increase in Anti-Social Behaviour**

In order to provide access to Mount Argus Way from Sundrive Road, it is proposed to eliminate the wall that currently exists at the end of Mount Argus Square. This is likely to result in an increase in anti-social behaviour from individuals circulating through that passage. Previously there was widespread and intimidating anti-social behaviour from individuals jumping the wall (An Garda Síochána can provide details of such incidents) and as a result fencing was erected on top of the wall (where the ivy now grows) to deter this. The fencing brought about a marked improvement. Removing the wall would undermine all the significant efforts which have been made in the last few years by Dublin City Council and the Mount Argus and Church Park Residents Association together to eradicate anti-social behaviour.

Mount Argus Park is not a gated park and is accessible 24 hours. We, and other residents still have to report incidents of anti-social behaviour from time to time to the Gardaí. Eliminating the wall, facilitating access to the park through the proposed cycle path, would cause an increase in these incidents at night. It would also lead to an increase in littering which is an ongoing problem in spite regular volunteer clean-ups of the park and estate by residents.

### 3. The Questionable Necessity of the Cycle Path as Currently Proposed

Lower Kimmage Road already has a decent, frequently used and well maintained cycle lane. Only minor improvements would be required to increase its safe usage for all road users (e.g. the addition of plastic/rubber poles between the cycle lane and the main road similar to those installed on Clanbrassil Street Upper, Dublin 8).

Bus Connects High-Speed Bus corridor already includes street markings for a cycle lane on each side of the corridor, evident on the plans, Map 5 Preferred Route, page 29 specifically refers to the carriage area being for no through traffic except buses, taxis and cyclists. Why, therefore, on a road with city-bound traffic being removed due to the presence of a bus gate, in addition to fines for those using the bus corridor, would a separate cycleway be required adjacent to the corridor?

We genuinely believe that the majority of cyclists based on Lower Kimmage Road have no interest in using the Poddle Park to Sundrive Road through Mount Argus Estate route and would prefer to use the current cycle route already available to them along Lower Kimmage Road.

The current proposed route is mostly urban and along narrow road with designated but not protected cycleway due to insufficient width. The Residents' Committee of our estate proposed an alternative cycle route which we fully support. This alternative runs from Sundrive Road through Eamonn Ceannt Park on to Clogher Road and along Clogher Road to the canal. Clogher Road has sufficient width to allow for a segregated cycleway to meet up with the canal. Potential direct access to this route from Sundrive Road could be established through the Council Depot opposite Blarney Park, further reducing mixing with traffic.

The current proposed route is At 1,993.48 metres this alternative is slightly longer than the current proposed route which is 1860.81 metres, however, the additional safety benefit should encourage usage as should the pleasant and scenic passage through Eamonn Ceannt Park.

### 4. The impact on Biodiversity

To build the new connection for the cyclists, the document notes that "there will be works on the adjacent riverbank [of the stoneboat], which has the potential to result in significant permanent negative effects" (page 29).

The Mount Argus Estate, due partly to its proximity to the River Poddle and Mount Argus Park is extremely rich in biodiversity and this is cherished by ourselves and other residents and the wider community who feel particularly grateful to live in an area within Dublin City where wildlife has been preserved and encouraged.

We fear the loss of wildlife in the form of trees, shrubbery and greenery in our small estate as a result of this Cycle Path and other associated works.

Changing the makeup of our small sized park to include a Cycle Path for City Centre commutes would most certainly negatively impact the atmosphere of the park and discourage people from continuing to visit and enjoy it.

In conclusion,

It is our opinion that this entire new proposed Cycle Path route makes no sense and is not an improvement to the efficient and effective cycle lane which our community already has and we strongly oppose it.

We sincerely feel that an upgraded Cycle Path through Eamonn Ceannt Park would better suit the needs of both cyclists and the wider Kimmage Community as it is a much bigger park and already contains a path nearly side enough to accommodate cyclists.

We ask that An Bord Pleanála consider our objection and urge that the proposal of a cycle path through our estate be rejected in order to ensure the best result for the community of our Estate and the wider community of Kimmage.

Thank you for your kind attention.

Yours Sincerely,

Sharon & Bruno

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Sharon Sabin de Oliveira and Bruno Rodrigues de Oliveira